



MAY 23 P2:36

February 10, 2005

MAY 17 2005

Notification of statements on Dietary Supplement Labels

Division of Compliance and Enforcement
Office of Nutritional Products, Labeling and Dietary Supplements
Food and Drug Administration
(HFS-810)
5100 Paint Branch Parkway
College Park, MD 20740-3835

Dear Sir/Madam:

Reference is made to Ultra potent DHA, marketed by Arkopharma, LLC.

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, as codified in 21 U.S.C. 343(r)(6), notification is submitted for structure/function statements made on the following dietary supplement product.

Product Name: Ultra potent DHA
Ingredient: Fish oil concentrate
Company Name/ Address: Arkopharma, LLC
19A Crosby Drive
Suite 300
Bedford, MA 01730-1401

Text of Claims:

1. Omega-3 DHA for Healthy Brain & Nerve Function
2. provides you with higher potency omega-3 DHA nutrition to support healthy brain and nervous system function.
3. Brain Healthy Omega-3

In accordance with 21 CFR 101.93, the disclaimer statement is bolded and boxed on all panels of the label where structure/function claims appear.

The undersigned certifies that the information contained in this notice is complete and accurate and that Arkopharma LLC has substantiation that the statement is truthful and not misleading.

As required, the original and two copies of this notification are enclosed. If you have any questions regarding this information, please contact the undersigned at (781) 276-0505.

Sincerely,

Barbara Levenstein

97S 0162

LET

16113

Barbara Levenstein, M.S.
Director of New Product Development
Arkopharma, LLC

ARKOPHARMA, LLC dba HEALTH FROM THE SUN
SALES, MARKETING & FINANCE OFFICE
19 Crosby Drive, Suite 300, Bedford, MA 01730 Tel: 781•276•0505 Fax: 781•276•7334/7335
WAREHOUSE & DISTRIBUTION CENTER
22 North Main Street, Newport, NH 03773 Tel: 603•863•8075 Tel: 800•447•2229 Fax: 603•763•9159